

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Obj. Deadline: September 19, 2023 at 4:00 p.m. ET

**NINTH MONTHLY FEE STATEMENT OF ALVAREZ & MARSAL NORTH
AMERICA, LLC AS FINANCIAL ADVISORS TO THE
DEBTORS AND DEBTORS-IN-POSSESSION FOR
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM JULY 1, 2023 THROUGH AND INCLUDING JULY 31, 2023**

Name of Applicant	Alvarez & Marsal North America, LLC
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	January 19, 2023 <i>nunc pro tunc</i> to November 11, 2022
Period for which compensation and reimbursement is sought:	July 1, 2023 through July 31, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$11,606,179.00
80% of Compensation sought as actual, reasonable and necessary:	\$9,284,943.20
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$441,563.02

This is a(n) **X** monthly ____ interim ____ final application. No prior application has been filed with respect to this Fee Period.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

PRIOR FEE STATEMENTS FILED

			Requested		Approved ²	
Fee Application	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
Interim Fee Application	3/17/23	11/11/22 – 1/31/23	\$27,864,801.00	\$631,004.78	\$27,484,801.00	\$611,004.78
Monthly Fee Statement	4/4/23	2/1/23 – 2/28/23	\$11,944,177.00	\$229,211.95	<i>pending</i>	<i>pending</i>
Monthly Fee Statement	4/28/23	3/1/23 – 3/31/23	\$13,320,206.50	\$541,063.33	<i>pending</i>	<i>pending</i>
Monthly Fee Statement	6/1/23	4/1/23 – 4/30/23	\$10,647,395.50	\$333,458.10	<i>pending</i>	<i>pending</i>
Monthly Fee Statement	6/30/23	5/1/23 – 5/31/23	\$12,213,841.00	\$761,812.61	<i>pending</i>	<i>pending</i>
Monthly Fee Statement	7/30/23	6/1/23 – 6/30/23	\$11,433,017.00	\$333,325.88	<i>pending</i>	<i>pending</i>

**SUMMARY OF BILLING BY PROFESSIONAL
JULY 1, 2023 THROUGH AND INCLUDING JULY 31, 2023**

Timekeeper Name	Position	Hourly Rate	Total Hours Billed	Total Compensation
Arnett, Chris	Managing Director	\$1,050	65.2	\$68,460.00
Bowles, Carl	Managing Director	\$1,025	8.0	\$8,200.00
Chambers, Henry	Managing Director	\$995	194.4	\$193,428.00
Farsaci, Alessandro	Managing Director	\$1,100	2.5	\$2,750.00
Gordon, Robert	Managing Director	\$1,025	148.7	\$152,417.50
Grosvenor, Robert	Managing Director	\$1,000	9.0	\$9,000.00
Hershan, Robert ³	Managing Director	\$1,100	62.8	\$69,080.00
Howe, Christopher	Managing Director	\$1,200	34.6	\$41,520.00
Iwanski, Larry	Managing Director	\$1,075	32.1	\$34,507.50
Jacobs, Kevin	Managing Director	\$1,100	43.3	\$47,630.00
Johnston, David	Managing Director	\$1,025	140.7	\$144,217.50
Kotarba, Chris	Managing Director	\$1,100	9.2	\$10,120.00
Kotarba, Steve	Managing Director	\$1,100	60.1	\$66,110.00

² Approved Fees/Expenses reflect any reduction agreed upon by A&M, the U.S. Trustee, and Fee Examiner.

³ Inclusive of billable time from prior months not previously included in prior Monthly Fee Applications.

Timekeeper Name	Position	Hourly Rate	Total Hours Billed	Total Compensation
Lawson, Alex	Managing Director	\$875	5.5	\$4,812.50
Marshall, Jonathan	Managing Director	\$1,075	2.6	\$2,795.00
Mosley, Ed	Managing Director	\$1,250	166.1	\$207,625.00
Ryan, Laureen	Managing Director	\$1,075	117.2	\$125,990.00
Stegenga, Jeffery	Managing Director	\$1,375	6.0	\$8,250.00
Wall, Guy	Managing Director	\$1,025	28.8	\$29,520.00
Managing Director Total			1,136.8	\$1,226,433.00
Seaway, Bill	Senior Advisor	\$1,100	25.4	\$27,940.00
Senior Advisor Total			25.4	\$27,940.00
Broskay, Cole	Senior Director	\$900	169.0	\$152,100.00
Callerio, Lorenzo	Senior Director	\$875	148.2	\$129,675.00
Canale, Alex	Senior Director	\$900	214.1	\$192,690.00
Chew, Ee Ling	Senior Director	\$750	3.3	\$2,475.00
Cooper, James	Senior Director	\$875	200.3	\$175,262.50
Coverick, Steve	Senior Director	\$950	167.2	\$158,840.00
Dusendschon, Kora	Senior Director	\$900	42.7	\$38,430.00
Esposito, Rob	Senior Director	\$875	251.9	\$220,412.50
Evans, Charles	Senior Director	\$835	11.1	\$9,268.50
Johnson, Robert	Senior Director	\$900	110.2	\$99,180.00
Konig, Louis	Senior Director	\$900	192.8	\$173,520.00
Kwan, Peter	Senior Director	\$900	168.7	\$151,830.00
Mohammed, Azmat	Senior Director	\$925	215.2	\$199,060.00
Nadimpalli, Vamsi	Senior Director	\$925	30.2	\$27,935.00
Negus, Matthew	Senior Director	\$900	29.8	\$26,820.00
Piechota, Robert	Senior Director	\$950	2.1	\$1,995.00
Ramanathan, Kumanan	Senior Director	\$950	196.0	\$186,200.00
Sequeira, Joseph	Senior Director	\$900	10.6	\$9,540.00
Sexton, Rachel ⁴	Senior Director	\$875	24.1	\$21,087.50
Shanahan, Michael	Senior Director	\$900	126.6	\$113,940.00
Titus, Adam	Senior Director	\$950	216.1	\$205,295.00
Wilson, Sean	Senior Director	\$950	1.6	\$1,520.00
Zatz, Jonathan	Senior Director	\$900	132.6	\$119,340.00
Senior Director Total			2,664.4	\$2,416,416.00
Arbid, Rami	Director	\$750	30.8	\$23,100.00
Baker, Kevin	Director	\$750	144.5	\$108,375.00

⁴ Bill rate has been adjusted to reflect the accurate amount moving forward. No prior adjustments are needed.

Timekeeper Name	Position	Hourly Rate	Total Hours Billed	Total Compensation
Balmelli, Gioele	Director	\$800	94.3	\$75,440.00
Bammert, Brett	Director	\$750	1.0	\$750.00
Casey, John	Director	\$725	90.0	\$65,250.00
Chamma, Leandro	Director	\$750	180.9	\$135,675.00
Dennison, Kim	Director	\$650	24.3	\$15,795.00
Flynn, Matthew	Director	\$775	196.1	\$151,977.50
Glustein, Steven	Director	\$800	242.0	\$193,600.00
Gosau, Tracy	Director	\$750	27.2	\$20,400.00
Hainline, Drew	Director	\$800	211.9	\$169,520.00
Kearney, Kevin	Director	\$800	212.9	\$170,320.00
Lambert, Leslie	Director	\$750	110.5	\$82,875.00
Lee, Julian	Director	\$750	165.1	\$123,825.00
Lewandowski, Douglas	Director	\$800	198.7	\$158,960.00
McGoldrick, Hugh	Director	\$750	19.3	\$14,475.00
McGrath, Patrick	Director	\$750	128.8	\$96,600.00
Medway, David	Director	\$750	239.8	\$179,850.00
Peoples, Scott ³	Director	\$750	26.0	\$19,500.00
Radis, Cameron	Director	\$750	43.6	\$32,700.00
Ruez, William	Director	\$750	37.6	\$28,200.00
Sullivan, Christopher	Director	\$825	198.3	\$163,597.50
van den Belt, Mark	Director	\$750	214.8	\$161,100.00
Walia, Gaurav	Director	\$825	231.9	\$191,317.50
Walker, William	Director	\$850	214.5	\$182,325.00
Director Total			3,284.8	\$2,565,527.50
Ardizzoni, Heather	Manager	\$700	141.0	\$98,700.00
Grussing, Bernice	Operations Manager	\$325	10.6	\$3,445.00
Hoffer, Emily	Manager	\$650	234.0	\$152,100.00
Lam, James	Manager	\$600	107.1	\$64,260.00
Li, Summer	Senior Manager	\$670	80.7	\$54,069.00
Lowe, Sam	Senior Manager	\$650	33.9	\$22,035.00
Mimms, Samuel	Manager	\$650	137.2	\$89,180.00
Pestano, Kyle	Manager	\$650	128.2	\$83,330.00
Sarmiento, Dubhe ⁵	Manager	\$650	29.3	\$19,045.00
Sivapalu, Anan	Manager	\$625	211.7	\$132,312.50
Sloan, Austin	Manager	\$650	27.0	\$17,550.00

⁵ Bill rate has been adjusted to reflect the accurate amount moving forward. No prior adjustments are needed.

Timekeeper Name	Position	Hourly Rate	Total Hours Billed	Total Compensation
Strong, Nichole	Manager	\$650	172.7	\$112,255.00
Yurchak, Lilia	Manager	\$650	104.1	\$67,665.00
Zhang, Qi	Senior Manager	\$670	216.3	\$144,921.00
Manager Total			1,633.8	\$1,060,867.50
Blanchard, Madison	Senior Associate	\$575	149.9	\$86,192.50
Cox, Allison	Senior Associate	\$575	151.7	\$87,227.50
Dagleish, Elizabeth	Senior Associate	\$700	106.3	\$74,410.00
DiNatale, Trevor	Senior Associate	\$700	2.5	\$1,750.00
Faett, Jack	Senior Associate	\$700	179.2	\$125,440.00
Helal, Aly	Senior Associate	\$575	135.2	\$77,740.00
Kuruvilla, Daniel	Senior Associate	\$700	145.5	\$101,850.00
Montague, Katie	Senior Associate	\$700	129.7	\$90,790.00
Sagen, Daniel	Senior Associate	\$725	171.8	\$124,555.00
Wilson, David	Senior Associate	\$575	173.6	\$99,820.00
Senior Associate Total			1,345.4	\$869,775.00
Braatelen, Troy	Associate	\$600	154.2	\$92,520.00
Chan, Jon	Associate	\$525	235.4	\$123,585.00
Collis, Jack	Associate	\$500	46.4	\$23,200.00
Corr, Caoimhe	Associate	\$500	19.2	\$9,600.00
Dobbs, Aaron	Associate	\$525	189.9	\$99,697.50
Ebrey, Mason	Associate	\$525	157.6	\$82,740.00
Francis, Luke	Associate	\$600	328.3	\$196,980.00
Gany, Jared	Associate	\$475	282.4	\$134,140.00
Glynn, Maiti	Associate	\$600	3.4	\$2,040.00
Gonzalez, Johnny	Associate	\$600	251.4	\$150,840.00
Haigis, Maya	Associate	\$525	57.5	\$30,187.50
Heric, Andrew	Associate	\$525	158.3	\$83,107.50
Hill, Liam	Associate	\$450	103.6	\$46,620.00
Mirando, Michael	Associate	\$600	204.5	\$122,700.00
Parker, Brandon	Associate	\$550	2.0	\$1,100.00
Patel, Ishika	Associate	\$525	99.7	\$52,342.50
Paterson, Warren	Associate	\$400	14.6	\$5,840.00
Price, Breanna	Associate	\$525	99.2	\$52,080.00
Schlam Batista, Sharon	Associate	\$500	83.5	\$41,750.00
Simkins, Maximilian	Associate	\$525	44.0	\$23,100.00
Sunkara, Manasa	Associate	\$525	230.9	\$121,222.50
Taraba, Erik	Associate	\$600	223.9	\$134,340.00

Timekeeper Name	Position	Hourly Rate	Total Hours Billed	Total Compensation
Trent, Hudson	Associate	\$625	287.0	\$179,375.00
Witherspoon, Samuel	Associate	\$575	204.0	\$117,300.00
Associate Total			3,480.9	\$1,926,407.50
Bruck, Ran	Consultant	\$600	189.9	\$113,940.00
Jones, Mackenzie	Consultant	\$600	183.6	\$110,160.00
Zabcik, Kathryn	Consultant	\$600	170.0	\$102,000.00
Consultant Total			543.5	\$326,100.00
Arora, Rohan	Analyst	\$425	136.8	\$58,140.00
Burns, Zach	Analyst	\$500	175.8	\$87,900.00
Clayton, Lance	Analyst	\$475	265.4	\$126,065.00
Hubbard, Taylor ³	Analyst	\$425	99.6	\$42,330.00
Liv-Feyman, Alec	Analyst	\$450	220.0	\$99,000.00
Lowdermilk, Quinn	Analyst	\$450	134.2	\$60,390.00
Myers, Claire	Analyst	\$425	93.5	\$39,737.50
Nizhner, David	Analyst	\$500	196.6	\$98,300.00
Okuzu, Ciera	Analyst	\$475	121.7	\$57,807.50
Pecen, Sena	Analyst	\$425	2.0	\$850.00
Radwanski, Igor	Analyst	\$450	153.7	\$69,165.00
Simoneaux, Nicole	Analyst	\$475	229.4	\$108,965.00
Slay, David	Analyst	\$525	207.9	\$109,147.50
Stockmeyer, Cullen	Analyst	\$450	189.5	\$85,275.00
Tenney, Bridger	Analyst	\$450	217.5	\$97,875.00
Yan, Jack	Analyst	\$450	101.7	\$45,765.00
Analyst Total			2,545.3	\$1,186,712.50
GRAND TOTAL			16,660.3	\$11,606,179.00

Blended Hourly Rate: \$696.64

STATEMENT OF FEES BY PROJECT CATEGORY⁶
JULY 1, 2023 THROUGH AND INCLUDING JULY 31, 2023

Project Name	Hours	Fee Amount
ACCOUNTING	1,102.5	\$766,459.00
ASSET SALES	301.7	\$253,742.50
AVOIDANCE ACTIONS	2,797.6	\$1,947,469.50
BUSINESS OPERATIONS	4,039.2	\$2,806,470.00
CASE ADMINISTRATION	97.2	\$96,405.00
CASH MANAGEMENT	558.3	\$386,171.00
CLAIMS	2,234.9	\$1,629,807.00
CONTRACTS	22.0	\$13,955.00
COURT AND UST REPORTING	290.2	\$208,993.50
CREDITOR COOPERATION	163.3	\$115,885.00
DISCLOSURE STATEMENT AND PLAN	1,060.6	\$676,152.50
DUE DILIGENCE	149.9	\$107,260.00
EMPLOYEE MATTERS	116.1	\$58,160.00
FEE APPLICATION	13.1	\$5,407.50
FINANCIAL ANALYSIS	1,438.7	\$973,150.00
INTERCOMPANY	181.0	\$140,159.00
JOINT PROVISIONAL LIQUIDATORS	784.8	\$523,755.00
LIQUIDATION ANALYSIS	54.8	\$39,662.50
LITIGATION	26.4	\$24,480.00
MOTIONS AND RELATED SUPPORT	15.6	\$13,842.50
NON-WORKING TRAVEL (BILLED AT 50%)	9.1	\$6,830.00
SCHEDULES AND STATEMENTS	931.6	\$572,175.00
TAX INITIATIVES	190.6	\$191,102.50
VENDOR MANAGEMENT	81.1	\$48,685.00
GRAND TOTAL	16,660.3	\$11,606,179.00

⁶ The subject matter of certain time entries may be appropriate for more than one project category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

SUMMARY OF ACTUAL AND NECESSARY EXPENSES

Expense Summary	
Expense Category	Amount
License Fees	\$374,309.31
Airfare	\$26,739.45
Lodging	\$19,876.11
Meals	\$11,710.86
Transportation	\$8,565.46
Miscellaneous	\$361.83
TOTAL	\$441,563.02

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**NINTH MONTHLY FEE STATEMENT OF ALVAREZ & MARSAL NORTH
AMERICA, LLC AS FINANCIAL ADVISORS TO THE
DEBTORS AND DEBTORS-IN-POSSESSION FOR
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM JULY 1, 2023 THROUGH AND INCLUDING JULY 31, 2023**

Alvarez & Marsal North America, LLC (“A&M”), Financial Advisors to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this Ninth Monthly Fee Statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from July 1, 2023, through and including July 31, 2023 (the “Fee Period”). In support of the Monthly Fee Statement, A&M respectfully states as follows:

Background

1. On November 11 and November 14, 2022,² the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.

the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors’ cases (the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 19, 2023, the Court entered the *Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Financial Advisors to the Debtors and Debtors-in-Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code* [D.I. 534], authorizing the retention and employment of A&M as the Debtors’ financial advisors, *nunc pro tunc* to November 11, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, [D.I. 435] (the “Interim Compensation Order”).

4. On March 8, 2023, the Court entered the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834] appointing Katherine Stadler (the “Fee Examiner”) to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

Relief Requested

5. By this Monthly Fee Statement and in accordance with the Interim Compensation Order, A&M makes this application for (i) allowance of compensation as an administrative expense of the Debtors’ estates in the amount of \$11,606,179.00 for reasonable

and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$9,284,943.20) and (iii) payment of \$441,563.02 for actual and necessary expenses incurred.

a. Compensation Requested

6. The services performed by A&M during the Fee Period included, among others, identification of assets, development of accounting records and reporting procedures, vendor outreach and management services, statements and schedules preparation, analysis of contracts, cooperation with various constituencies including the Official Committee of Unsecured Creditors and the United States Trustee, evaluating potential preference and avoidance actions, assistance with cash management services, and assessment of the components included in and relating to the Chapter 11 plan. The following exhibits are attached hereto for the Fee Period: (i) Exhibit A is a summary of time detail by professional; (ii) Exhibit B is a summary of time by task; (iii) Exhibit C is a summary of time records by professional by project category; and (iv) Exhibit D is a summary of time detail by activity by professional. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

7. The timekeepers who rendered services related to each category are identified in Exhibit A, Exhibit B, Exhibit C, and Exhibit D along with the number of hours for each individual and the total compensation sought by each category. All services for which A&M requests compensation were performed for, or on behalf of, the Debtors.

b. Expense Reimbursement

8. A&M incurred out-of-pocket expenses during the Fee Period in the amount of \$441,563.02. The following exhibits are attached hereto for the Fee Period:

(i) Exhibit E is a summary of expenses by category and (ii) Exhibit F is a description of the expenses actually incurred by A&M in the performance of services rendered as Financial Advisors to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: license fees, airfare, lodging, out of town meals, transportation, and other expenses.

9. In accordance with section 330 of the Bankruptcy Code, A&M seeks reimbursement only for the actual cost of such expenses to A&M. A&M submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

Valuation of Services

10. Professionals of A&M have expended a total of 16,660.3 hours in connection with this matter during the Fee Period.

11. The amount of time spent by each of the professionals providing services to the Debtors for the Fee Period is set forth in Exhibit A, Exhibit B, Exhibit C, and Exhibit D. The rates are A&M's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by A&M for the Fee Period as Financial Advisors for the Debtors in the Chapter 11 Cases is \$11,606,179.00.

12. A&M believes that the time entries included in Exhibit A, Exhibit B, Exhibit C, and Exhibit D, attached hereto and the expense breakdown set forth in Exhibit E and Exhibit F attached hereto are in compliance with the requirements of Local Rule 2016-2.

13. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

Certificate of Compliance and Waiver

14. The undersigned representative of A&M certifies that he has reviewed the requirements of Local Rules 2016-2 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, A&M believes that such deviations are not material and respectfully requests that any such requirements be waived.

Notice and No Prior Request

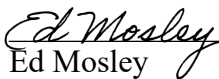
15. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors, (c) the Fee Examiner; and (d) all parties required to be given notice in the Interim Compensation Order. A&M submits that no other or further notice is necessary.

16. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

WHEREFORE, A&M respectfully requests that the Bankruptcy Court
(i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

Respectfully,

Alvarez & Marsal North America, LLC

By: _____
Ed Mosley
Title: Managing Director